

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

TIMOTHY RYAN

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Cr. No. 22-mj-261-AJ

ASSENTED-TO MOTION TO AMEND BAIL CONDITIONS

Tim Ryan respectfully moves the Court to amend his release conditions. Tim's current release conditions, set by the Court on March 17, 2023, require that he live at VENOC in Haverhill, MA. ECF Doc. 14, ¶ Z. This placement was intended to be temporary until a more comprehensive program affiliated with the Veterans Administration (VA) in Bedford, MA became available. The VA has indicated a bed will open for Tim at this facility on Monday, March 23, 2023. Transportation between the two facilities has been arranged.

The Defense requests that the Court amend Tim's release conditions, specifically condition Z, to require that he reside at VENOC until March 23, 2023, and at the Bedford VA's "Dom" program thereafter.

The Government, through AUSA K. Weiland has no objection to this request. United States Probation, through USPO K. Hess, similarly has no objection.

WHEREFORE, Tim Ryan respectfully moves the Court respectfully moves the Court to amend his release conditions to authorize him to reside at the VA's "Dom" program in Bedford, Massachusetts.

Respectfully submitted,

Dated: March 24, 2023

/s/ Eric Wolpin

Eric Wolpin

N.H. Bar #18372

Assistant Federal Public Defender

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